



## Health and Human Services Agency California Office of HIPAA Implementation

# POLICY MEMORANDUM

**TO:** Department Chief Deputy Directors  
Department HIPAA Coordinators

**FROM:** CALIFORNIA OFFICE OF HIPAA IMPLEMENTATION (CalOHI)

<b>Title:</b> Communication	<b>Number:</b> 2002-09
<b>Subject:</b> Communication with Stakeholders, Business Associates and Trading Partners	<b>Issue Date:</b> October 2, 2002
<b>Reference(s):</b> Health & Safety Code, Section 130300	<b>Expiration Date:</b> None

## PURPOSE

To introduce CalOHI's theme of communication between HIPAA impacted departments and their business partners, stakeholders and customers.

## BACKGROUND

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Senate Bill 456 provided in its intent language:

"In view of the substantial changes that HIPAA will require in the practice of health entities and their business associates, the ability of California government to continue the delivery of vital health services will depend upon the implementation of HIPAA in a manner that is coordinated among state departments as well as our partners in county government and the private health sector."

The federal HIPAA privacy regulations become effective April 14, 2003 and the transactions and code sets regulations become effective October 16, 2002, or October 16, 2003 with the timely request for a federal extension.

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## ISSUES

In light of the legislative mandate and the need for effective communication in the next eighteen months as we reach the deadline for the two major HIPAA rules to become effective, CalOHI has established “**COMMUNICATION**” as a major theme for 2002-03.

As you know, HIPAA has far reaching impact on many departments, those you do business with; your trading partners, business associates, stakeholders and ultimately their and your customers and clients. Timely and coordinated implementation will be necessary to avoid disruptions in business processes and service deliveries.

In recent weeks, CalOHI has received several contacts from both local government agencies and private health care organizations. These contacts raised concerns about when communication from their State department business partners concerning the implementation of HIPAA would be initiated.

## CALOHI ACTIONS

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This is the first of a series of Policy Memorandums that CalOHI will issue addressing the subject of departments communicating with their business partners, stakeholders and customers. The first actions CalOHI will be taking toward this goal are:

- ✓ CalOHI has established department liaisons for each department impacted by the HIPAA regulations. The CalOHI staff members who are liaisons are in contact with your departments' HIPAA coordinators on an ongoing basis. A list of the liaison assignments is attached.
- ✓ The HIPAA Advisory Committee was established to enhance communication with all stakeholders and interested parties of HIPAA implementation. The Committee includes representatives from both private and local, state, administrative, and legislative government branches. It meets quarterly.
- ✓ We have made communication the focus of our next Advisory Committee meeting scheduled for November. To share information and begin dialogues with stakeholders, several departments will be presenting their plans and progress with HIPAA implementation.

- ✓ CalOHI and the HIPAA Steering Committee are re-establishing the Communications Work Group. The first charge for the workgroup will be to develop a template for a communications plan that Departments can adapt as part of their HIPAA implementation plan.
  - ✓ CalOHI continues to encourage departments to participate in the HIPAA Work Groups. Participating in collaborative efforts will assist departments in accomplishing the challenges we face in the timely implementation of HIPAA requirements. To achieve an economy of scale in resource utilization, CalOHI suggests that many of the tasks required for implementing HIPAA can be accomplished in collaboration with the HIPAA Work Groups and/or amongst 2 or more departments.
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## **DEPARTMENT ACTIONS**

Toward the end of furthering communication, CalOHI is requesting that departments do the following:

- ✓ Departments should inform CalOHI of any meetings they are having with their business partners concerning HIPAA issues. Departments may share the meeting information with their Department's liaison in CalOHI.

CalOHI may participate in, or in some instances as needed, facilitate meetings between State departments and their business partners. Our goal is to provide a broad perspective that may be a framework facilitating effective information sharing.

CalOHI will work with departments to increase communications with their business partners as they progress through the implementation process.

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## CONTACT

If you have any questions, please contact:

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*Original signed by Burt R. Cohen*

BURT R. COHEN  
Acting Director  
California Office of HIPAA Implementation

Attachment: List of CalOHI Liaisons

Cc: Steve Kessler, Department of Finance  
Peter Harbage, Health and Human Services Agency